

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

CORY GROSHEK,
And all others, similarly situated,

Plaintiffs,
vs. Case No.: 15-cv-143-jdp

GREAT LAKES HIGHER EDUCATION
CORPORATION,
Defendant.

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT
AND FINAL CERTIFICATION OF RULE 23 SETTLEMENT CLASS**

The Plaintiffs, by and through their undersigned attorneys, hereby move the Court for Final Approval of this Class Action Settlement and Final Certification of the Rule 23 Settlement Class. This Motion will be heard on October 14, 2016 at 9:00 A.M. as scheduled by the Court. The bases for this motion are set forth in the Brief in Support of this motion together with the Declaration of Attorney Straka and the other pleadings on file with this Court.

The Plaintiffs now move this Court for a Final Order approving the settlement and to include the following:

- 1) Finally approving the Settlement Agreement, adjudging its terms to be fair, reasonable and adequate, and directing consummation of its terms and provisions;
- 2) Finally approving the notice given to the Class as satisfactory under the requirements of Due Process and Federal Rule of Civil Procedure 23;
- 3) Finally dismissing the lawsuit and Plaintiffs' Complaint on the merits with prejudice, and barring and permanently enjoining, to the fullest extent of applicable law, Class

Representatives and all Class Members (aside from those filing timely and valid Requests for Exclusion) from pursuing any claims that were released against Defendants, as set forth in the Settlement Agreement; and

- 4) An enhancement award to Plaintiff Cory Groshek in the amount of \$7,200.

Pursuant to the parties' Settlement Agreement, class counsel will separately petition the Court for attorneys' fees and costs as well as settlement administration fees costs.

Dated: September 30, 2016

Respectfully submitted,

s/ Michael J. Modl

Michael J. Modl
AXLEY BRYNELSON, LLP
2 E. Mifflin Street, Suite 200
Madison, WI 53703
Tel: (608) 257-5661
Fax: (608) 257-5444
mmodl@axley.com

s/ Heath P. Straka

Heath P. Straka
Robert J. Gingras
GINGRAS, CATES & LUEBKE
8150 Excelsior Drive
Madison, WI 53717
Tel: (608) 833-2632
Fax: (608) 833- 2874
straka@gcllawyers.com
gingras@gcllawyers.com

Attorneys for Plaintiff Cory Groshek